



January 25, 2024

VIA ECF FILING

Honorable James B. Clark, III  
United States Magistrate Judge  
for the District of New Jersey  
50 Walnut Street  
Newark, NJ 07101

Re: Flores v. Paradise et al  
Docket # 23 cv 22894-EP-JBC

Dear Magistrate Judge Clark:

I represent the plaintiff in the above matter. We have an initial conference scheduled before the Court on March 18, 2024.

Briefly, this matter stems from a motor vehicle involving a tractor trailer on March 29, 2022. As a result of the accident, Ms. Flores is claiming serious injuries, *inter alia*, lumbar fusion at L5-S1.

I am writing, with the consent of defense counsel, to respectfully request that the Court accelerate this conference to an earlier date. The reason for the request is that the 2 year statute of limitations expires on March 29, 2024 (my firm was only retained in mid-November 2023 and commenced the lawsuit on December 5, 2023). We are concerned that there are potentially liable parities that need to be added as direct defendants before the filing deadline.

The parties remain available at the Court's convenience to address any questions or concerns.

Regards,

Joseph D. Monaco, Esq.

CC: Leonard Leicht, Esq.  
William Perrelli, Esq.

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